

EXHIBIT A

Exhibit A - Specific Portions of Plaintiffs' Declarations Trinidad Seeks to Strike

For the reasons set forth in Trinidad Drilling, LP's, Motion to Strike Plaintiffs' Evidence and Reply to Plaintiffs' Response to Motion for Summary Judgment, Trinidad seeks to strike from the evidentiary record on summary judgment, the following statements contained in the various declarations submitted by the Plaintiffs.

From the Declaration of Ryan Walker:

1. Trinidad seeks to strike paragraphs 3, 4, 6, and 26 in their entirety.
2. Trinidad seeks to strike the following statement from paragraph 2: "In the United States, Trinidad had a Northern Division and a Southern Division. The Northern Division generally included areas of Colorado and north of Colorado whereas the Southern Division generally included areas south of Colorado. Each Division had a Vice President of Operations. The Vice President of Operations for the division in which I worked, the Southern Division, was not Carlton Campbell. I have never met or heard of a person named Carlton Campbell."
3. Trinidad seeks to strike the following statement from paragraph 5: "When a drilling rig was stacked, drilling rig crew members were either laid off or transferred to another operational drilling rig in the same regional area, which resulted in a crew member on that drilling rig losing his job."
4. Trinidad seeks to strike the following statement from paragraph 7: "Below George in seniority over me was the Rig Manager position."
5. Trinidad seeks to strike the following statement from paragraph 11: "Most of those tools and parts, if not already in storage in the Springtown Yard, were delivered to the Springtown Yard and then brought to the drilling rig by the managers of the rig, such as the Drilling Superintendent or Rig Manager. Additionally, if other drilling rigs operating in Trinidad's North Central Texas region had spare parts or equipment, those spare parts or equipment would be sent to our drilling location for use. Examples of that spare equipment I recall being shared amongst drilling rigs in Trinidad's North Central Texas region include pump parts and hydraulic cylinders."
6. Trinidad seeks to strike the following statement from paragraph 15: "Each drilling rig of Trinidad's had the same positions – Driller, Derrickhand, Motorhand, and Floorman, and employees performing those job duties were interchangeable on the Trinidad drilling rigs operating through the Springtown Yard in the North Central Texas region. There was no different "T.E.S.T." training program for each drilling rig for those job titles. If a particular drilling rig operating through the Springtown Yard was short an employee on a particular job position, then employees from other rigs, mainly those who were not working a hitch, were sent to work on that drilling rig. I recall employees from various drilling crews coming to work with my drilling crew when we were short-handed. Furthermore, promotions from one position to another, such as Motorhand to Derrickhand, sometimes involved Roughnecks working on different drilling rigs of Trinidad that operated through the Springtown Yard in the North Central Texas Region."

From the Declaration of Richard Sisney, Jr.:

7. Trinidad seeks to strike paragraphs 4, 6, 7, and 8 in their entirety.
8. Trinidad seeks to strike the following statement from paragraph 2: “When employed by Trinidad, I worked out of its San Antonio Yard. Trinidad had many drillings rigs which operated from that yard which were stacked, or put out of operations, around the same time as my layoff. The Trinidad San Antonio Yard operated drilling rigs in the South Texas area, primarily in the Eagle Ford Shale.”
9. Trinidad seeks to strike the following statement from paragraph 5: “The Rig managers Operated [sic] under the management of the San Antonio Yard.”

From the Declaration of Frank A. Fetters, III:

10. Trinidad seeks to strike paragraphs 4, 5, and 6 in their entirety.
11. Trinidad seeks to strike the following statement from paragraph 3: Trinidad had a rig yard in Woodward, Oklahoma (the “Woodward Yard”) which was the home base for drilling rigs operating in the area around Woodward, Oklahoma. Parts, supplies and equipment for drilling rigs operating through the Woodward Yard came from the Woodward Yard. Trinidad had approximately five to seven drilling rigs operating through the Woodward Yard during my employment. The Woodward Yard drilling rigs operated in the area around Woodward, Oklahoma, primarily if not only in the Anadarko Basin.”